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ATTORNEYS FOR DEFENDANTS,  
LEWIS HEBERT AND  
SOUTHEAST DIRECTIONAL  
DRILLING, LLC

BRIAN SIMMERS and  
KELSEY SIMMERS,

Plaintiffs,

v.

LEWIS HERBERT; SOUTHEAST  
DIRECTIONAL DRILLING, LLC; and,  
STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY,

Defendants.

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA

No. \_\_\_\_\_

**RULE 7.1 DISCLOSURE**

Pursuant to Local Rule 7.1.1 of the Western District of Pennsylvania and to enable Judges and Magistrate Judges to evaluate possible disqualification or recusal, the undersigned counsel for Southeast Directional Drilling, LLC, in the above-captioned action certifies that there are no parents, subsidiaries, and/or affiliates of Southeast Directional Drilling, LLC that have issued shares or debt securities to the public.

In addition, counsel for Southeast Directional Drilling, LLC makes the following disclosures regarding parents, subsidiaries, and/or affiliates of said party:

Southeast Directional Drilling, LLC is:

- (1) A Minnesota limited liability company; and
- (2) Its shares are not publicly traded.

**POST & SCHELL, P.C.**

**BY:**

A handwritten signature in black ink, appearing to read 'Richard B. Wickersham', is written over a horizontal line.

RICHARD B. WICKERSHAM, ESQUIRE  
Attorneys for DEFENDANTS, LEWIS  
HEBERT and SOUTHEAST  
DIRECTIONAL DRILLING, LLC

**DATED:** May 14, 2015